

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

**IN RE: PHARMACEUTICAL INDUSTRY AVERAGE
WHOLESALE PRICE LITIGATION**

MDL No. 1456
C.A. No. 01-12257-PBS

THIS DOCUMENT RELATES TO:
International Union of Operating Engineers,
Local No. 68 Welfare Fund v. AstraZeneca PLC, *et al.*

Judge Patti B. Saris

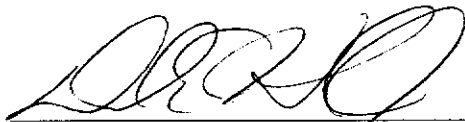
**NOTICE OF COMPLIANCE WITH THE COURT'S DIRECTIVE OF
JANUARY 27, 2006 BY PLAINTIFF, INTERNATIONAL UNION
OF OPERATING ENGINEERS, LOCAL NO. 68 WELFARE FUND,
RESPECTING THE PRODUCTION OF ADDITIONAL
DOCUMENTS AND A PRIVILEGE LOG**

In accordance with this Court's directive at the hearing held on January 27, 2006, respecting Plaintiff's Motion for Remand, plaintiff has now produced, additional documents and a privilege log to counsel for AstraZeneca Pharmaceuticals, LP. Plaintiff specifically reserves the right to challenge on appeal the issue of the Court's directive requiring production of documents as to which plaintiff has asserted a privilege, confidentiality and non-discoverability by reason of the fact that said documents refer and relate to ongoing confidential settlement negotiations with adverse parties.

Date: February 3, 2006

Respectfully submitted,

Ronald J. Ranta, Esquire
FISETTE & RANTA
B.B.O. No. 411880
100 Cummings Center, Suite 221B
Beverly, MA 01915
978-927-8766 telephone
978-927-7082 facsimile


Donald E. Haviland, Jr., Esquire
TerriAnne Benedetto, Esquire
KLINE & SPECTER
1800 Chapel Avenue, Suite 302
Cherry Hill, NJ 08002
856-662-1180 telephone
856-662-1184 facsimile

John E. Keefe, Jr., Esquire
Stephen T. Sullivan, Jr., Esquire
LYNCH ♦ KEEFE ♦ BARTELS
830 Broad Street
Shrewsbury, NJ 07702
732-224-9400 telephone
732-224-9494 facsimile

Raymond A. Gill, Jr., Esquire
GILL & CHAMAS
655 Florida Grove Road
P.O. Box 760
Woodbridge, NJ 07095
732-324-7600 telephone
732-324-7606 facsimile

ATTORNEYS FOR PLAINTIFF AND THE CLASS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Compliance with the Court's Directive of January 27, 2006 by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund, Respecting the Production of Additional Documents and a Privilege Log was served on all counsel via LexisNexis pursuant to Case Management Order No. 2. The parties listed below are not registrants of LexisNexis and are being served First Class Mail and facsimile:

Joseph M. Gorrell, Esquire
WOLF BLOCK, LLP
101 Eisenhower Parkway
Roseland, NJ 07068
Counsel for Saad Antoun, M.D.

Robert L. Washburn, Esquire
CLOPPERT, LATANICK, SAUTER & WASHBURN
225 East Broad Street
Columbus, OH 43215
Counsel for Robert A. Berkman, M.D.

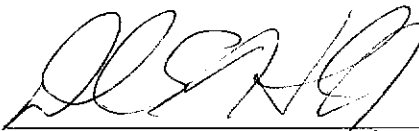
Michael Mustokoff, Esquire
DUANE MORRIS LLP
One Liberty Place, Suite 4200
Philadelphia, PA 19103-7396
Counsel for Saad Antoun, M.D.

Jack Fernandez, Esquire
ZUCKERMAN, SPAEDER, LLP
101 E. Kennedy Blvd., Suite 1200
Tampa, FL 33602
Counsel for Stanley C. Hopkins, M.D.

Terry K. Sherman, Esquire
52 West Whittier Street
Columbus, OH 43206
Counsel for Robert A. Berkman, M.D.

Respectfully submitted,

Dated: February 3, 2006



Donald E. Haviland, Jr. Esquire
KLINE & SPECTER
1800 Chapel Avenue, Suite 302
Cherry Hill, NJ 08002
856-662-1180 telephone
856-662-1184 facsimile